

**REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor Ira L. Fenton Case No. 20-13999 Chapter 13

All Cases: Moving Creditor Towd Point Mortgage Trust 2015-3, U.S. Bank National  
Association as Indenture Trustee Date Case Filed: 7/16/2020

Nature of Relief Sought:  Lift Stay  Annul Stay  Other (Describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing 9/03/2020 or Date Plan Confirmed \_\_\_\_\_

Chapter 7: No Asset Report Filed on \_\_\_\_\_

No Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

a.  Home  Real Property  
b.  Car Year, Make, and Model \_\_\_\_\_  
c.  Other (describe) \_\_\_\_\_

2 Balance Owed as of July 22, 2020 \$165,027.96 \_\_\_\_\_

Total of all other liens against Collateral \$40,000.00 \_\_\_\_\_

In chapter 13 cases, attach a payment history listing the amounts and dates of all payments received from the Debtor post-petition. \_\_\_\_\_

4 Estimated Value of Collateral (must be supplied in all cases) \$164,000.00 \_\_\_\_\_

5. Default

a.  Pre-Petition Default  
Number of Months 15 Amount: \$28,379.12 \_\_\_\_\_

b.  Post-Petition Default  
i.  On Direct Payments to the Moving Creditor  
Number of Months \_\_\_\_\_ Amount \_\_\_\_\_  
ii.  On Payments to the Standing Chapter 13 Trustee  
Number of Months \_\_\_\_\_ Amount \_\_\_\_\_

**N/A – Debtor Surrendering Property**

6. Other Allegations

a.  Lack of Adequate Protection §362(d)(1)  
i.  No Insurance  
ii.  Taxes Unpaid Amount \_\_\_\_\_  
iii.  Rapidly Depreciating Asset  
iv.  Other (describe) \_\_\_\_\_

b.  No Equity and not Necessary for an Effective Reorganization §362(d)(2)

c.  Other “Cause” §362(d)(1)  
i.  Bad Faith (describe) \_\_\_\_\_  
ii.  Multiple Filings  
iii.  Other (describe) \_\_\_\_\_

d. Debtor’s Statement of Intention Regarding the Collateral  
i.  Reaffirm ii.  Redeem  
iii.  Surrender iv.  No Statement of Intention Filed  
v.  Not Listed on Statement of Intention Filed

Date: 08/03/2020 \_\_\_\_\_ /s/ Matthew C. Abad \_\_\_\_\_